

April 22, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 08-54
Supplement to Pending Domestic Section 214 Application

Dear Ms. Dortch:

This letter is submitted jointly by IT&E Overseas, Inc. ("IT&E Overseas") and PTI Pacifica Inc. ("PTI Pacifica") in reference to their April 7, 2008 domestic Section 214 application filed in the above-referenced docket.¹ This letter provides responses to inquiries from the Commission's Wireline Competition Bureau staff.

As discussed in the April 7 Application, Pacific Telecom Inc. (PTI Pacifica's indirect corporate parent) proposes to buy the telecommunications assets of IT&E, including IT&E's FCC authorizations, infrastructure and subscriber bases. Pacific Telecom Inc. intends to assign these assets to its wholly-owned subsidiary PTI Pacifica. After consummation of the transaction, IT&E Overseas will continue to exist as a corporation (completely independent of Pacific Telecom and PTI Pacifica) and will engage in businesses unrelated to telecommunications. IT&E Overseas has the following ten percent or greater interest holders: Jose D. Perez (74.700%) and John M. Borlas (23.886%), each of whom is a U.S. citizen and each of whose mailing address is P.O. Box 24881, Barrigada, Guam 96921.

Currently IT&E Overseas and PTI Pacifica each provides pre-subscribed and pre-paid calling card service in both CNMI and Guam and face significant competition in the long distance market.² Post-transaction PTI Pacifica will continue to face significant competition. See the attachment for a list of some of the current long distance competitors. Among the competitors listed are Guam Cellular and I-Connect, each of whom is a facilities-based wireless

¹ Joint International and Domestic Section 214 Application for Consent to Assignment/Acquisition of Assets, filed April 7, 2008, by IT&E Overseas, Inc. (assignor) and PTI Pacifica Inc. (assignee), WC Docket No. 08-54 ("April 7 Application").

² IT&E Overseas operates as a CLEC in Guam but not in CNMI. PTI Pacifica has no CLEC business either in Guam or CNMI (where PTI Pacifica's parent is the ILEC). The extent of current and potential wireless competition in CNMI and Guam is addressed in the exhibits to the parties' April 4, 2008 Form 603 wireless assignment application submitted under ULS File No. 0003356838.

Ms. Marlene H. Dortch

April 22, 2008

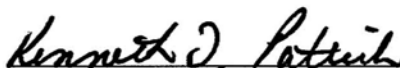
Page 2

carrier in both CNMI and Guam whose rate plans include "free long distance" to U.S. destinations.³ Similarly, Pulse Mobile, the B-side cellular carrier affiliated with the Guam incumbent local exchange carrier, also offers a rate plan with free long distance. The listing of pre-paid calling card providers is not exhaustive as many different calling cards are available at numerous retail outlets in CNMI and Guam. Moreover, consumers may purchase pre-paid calling cards over the Internet, many targeting specific calling destinations. In light of this existing extensive competition for long distance service and the lack of barriers to entry by new competitors, PTI Pacifica has no intention of increasing long distance rates for pre-subscribed customers as part of this transaction.

Finally, this letter corrects a typographical error on page 9 of the April 7 Application. As mentioned elsewhere in the Application, the corporate domicile of Sumitomo Corporation is Japan. Sumitomo Corporation does not hold a greater than 10 percent direct or indirect ownership interest in any U.S. wireline or wireless carrier other than PTI Pacifica.

Please contact the undersigned if you have any questions.

Respectfully submitted,



Kenneth D. Patrich

Timothy J. Cooney

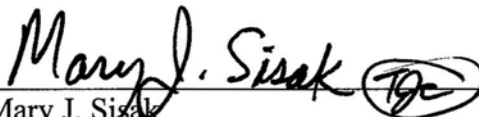
Wilkinson Barker Knauer, LLP

2300 N Street, N.W., Suite 700

Washington, D.C. 20037

(202) 783-4141

Attorneys for PTI Pacifica Inc.



Mary J. Sisak

Blooston, Mordkofsky, Dickens, Duffy

& Prendergast LLP

2120 L Street, N.W., Suite 300

Washington, D.C. 20037

(202) 828-5554

Attorney for IT&E Overseas, Inc.

³ In addition to free long distance with its wireless rate plans in CNMI and Guam, Guam Cellular also offers both pre-subscribed long distance service and pre-paid calling cards in CNMI and Guam.

NON-EXHAUSTIVE LIST OF LONG DISTANCE COMPETITORS

Carrier	Services	Locations
Guam Cellular d/b/a GuamCell in Guam d/b/a SaipanCell in CNMI ¹	pre-subscribed long distance; pre-paid calling cards; wireless service with free long distance.	CNMI and Guam for each listed service
Guam Telephone Authority ² d/b/a GTA (ILEC in Guam) and Pulse Mobile (B-side Cellular)	pre-subscribed long distance; pre-paid calling cards; wireless service with free long distance.	Guam
Telepacific Network Inc. ³	pre-subscribed long distance; pre-paid calling cards.	CNMI and Guam for each listed service
MCI	long distance; pre-paid calling cards.	CNMI
Choice Phone/Wave Runner d/b/a I-Connect ⁴	wireless service with free long distance.	CNMI and Guam
Hello Pinoy ⁵	pre-paid calling cards.	Guam
Hello Asia ⁶	pre-paid calling cards.	CNMI and Guam
Hafa Adai	pre-paid calling cards.	CNMI
Thru-Tel	pre-paid calling cards.	CNMI
EZtel ⁷	pre-paid calling cards; neighborhood long distance calling centers.	CNMI
Luzviminda ⁸	pre-paid calling cards.	Guam

¹ See http://www.saipancell.com/main/index.php?pg=products_services.

² See http://www.gta.net/mpulse_r_gsm.asp?lnc=mpulse_r_gsm_bundles.

³ See <http://www.tniguam.com/>.

⁴ See <http://www.iconnectguam.com/cellular.php>.

⁵ See <http://www.hellocallingcards.com/hello-pinoy.asp>.

⁶ See http://www.phonecardsmile.com/calling_card/Hello_Asia_Continental_phone_card.html.

⁷ See <http://www.ezsaipan.com/aboutus.php>.

⁸ See www.hellocallingcards.com/luzviminda.asp.